

To: Rao, Kate[Rao.kate@epa.gov]
From: Dermer, Michele
Sent: Mon 5/18/2015 9:18:32 PM
Subject: RE: CA UIC Desk Statement re: May 15th deliverable

Thanks. Why would we not put this up on our website too?

From: Rao, Kate
Sent: Monday, May 18, 2015 2:03 PM
To: Montgomery, Michael; Albright, David; Dermer, Michele; Zito, Kelly; Keener, Bill; Mogharabi, Nahal; Skadowski, Suzanne
Cc: Maier, Brent
Subject: CA UIC Desk Statement re: May 15th deliverable

Below is final desk statement. Includes edits by OPA and has correct link to DOGGR webpage with May 15th material.

U.S. EPA is continuing its review of California's Division of Oil, Gas and Geothermal Resources' (DOGGR) Class II Underground Injection Control primacy program, including the state's implementation of the Class II UIC program, the identification of Class II injection wells that may be injecting into non-exempt aquifers, the state's ongoing assessment of drinking water sources that may be impacted by improper injection, and the establishment of an effective process for reviewing and approving aquifer exemptions in California. EPA's December 22, 2014, letter directed the state to submit a Program Revision Plan by February 6, 2015. After reviewing the state's plan, and based on further discussion with the state agencies, EPA issued a letter to the state on March 9, 2015 concurring on key aspects of the state's plan and setting out a schedule of required activities and deliverables, with target milestones and compliance deadlines to ensure that the state continues to make progress towards full compliance with the Safe Drinking Water Act, and meets a February 15, 2017 compliance deadline for Class II wells currently injecting into non-exempt aquifers.

On May 15, 2015, EPA received the state's submittal in accordance with the timeframe set forth in EPA's March 9, 2015 California Class II UIC Program Corrective Action Plan Schedule, which required:

- completed evaluations for "Category 1" injection wells (this is the state's review of the Class II water disposal wells injecting into non-exempt, non-hydrocarbon-bearing aquifers and the 11 aquifers historically treated as exempt); and

- a revised Enclosure B of the State's February 6, 2015 letter to incorporate cyclic steam wells and provide a schedule for completing a review of these wells and submission of proposed aquifer exemptions, as applicable, to meet the February 15, 2017 compliance deadline.

EPA is reviewing the submitted material, which is publicly available on the state's website at: [http://www.conservation.ca.gov/dog/general_information/Pages/UndergroundInjectionControl\(UIC\).aspx](http://www.conservation.ca.gov/dog/general_information/Pages/UndergroundInjectionControl(UIC).aspx). After completing our review over the next few weeks, EPA expects to provide a written response to the state regarding the information it submitted.

EPA will continue our oversight of the state's efforts to ensure that California's Class II UIC program is in compliance with the Safe Drinking Water Act. To access information about EPA's review of CA's UIC program, please visit: <http://www.epa.gov/region9/mediacenter/uic-review/index.html>.

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